

LIPSON, NEILSON P.C.  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
DAVID A CLARK  
Nevada Bar No. 4443  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144  
(702) 382-1500  
(702) 382-1512 - fax  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)  
[dclark@lipsonneilson.com](mailto:dclark@lipsonneilson.com)

*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CENTURY-NATIONAL INSURANCE  
COMPANY, a California corporation, PACIFIC  
PIONEER INSURANCE GROUP, INC., a  
Delaware corporation, PACIFIC PIONEER  
INSURANCE COMPANY, a California  
corporation, and UCA GENERAL  
INSURANCE SERVICES, a California  
corporation,

Plaintiffs,

v.

DOUGLAS J. GARDNER, ESQ., an individual,  
DOUGLAS J. GARDNER, LTD., a Nevada  
domestic professional corporation, RANDS &  
SOUTH, LTD., a Nevada domestic  
professional corporation, ALPS  
CORPORATION, a Montana corporation,  
DOES 1 through 20, inclusive.

Defendants.

CASE NO.: 2:18-cv-02090-APG-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE  
RESPONSE TO PLAINTIFF'S  
COMPLAINT (ECF NO. 1)**

**(FIRST REQUEST)**

Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC PIONEER  
INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and UCA  
GENERAL INSURANCE SERVICES and Defendant, DOUGLAS J. GARDNER, ESQ.,  
DOUGLAS J. GARDNER, LTD, and RANDS & SOUTH, LTD., by and through their  
respective counsel, hereby agree and stipulate as follows:

IT IS HEREBY AGREED AND STIPULATED, that the deadline for Defendant Douglas J. Gardner, Esq. to respond to Plaintiffs' Complaint (ECF No. 1), currently due on November 26, 2018, shall be extended to **December 7, 2018**. This is the parties' first request for extension and is their way of accommodating each other. The parties certify that this Stipulation is made in good faith and is not sought for the purpose of undue delay or to cause prejudice to any party.

DATED this 27<sup>th</sup> day of November, 2018

DATED this 27<sup>th</sup> day of November, 2018.

PHILLIPS SPALLAS & ANGSTADT LLC

LIPSON NEILSON P.C.

/s/ John A. Marshall

/s/ David A. Clark

John A. Marshall, Esq.  
Mark S. Reusch, Esq.  
MARSHALL & ASSOCIATES  
26565 W. Agoura Road, Suite 200  
Calabasas, California 91302

JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
DAVID A CLARK  
Nevada Bar No. 4443  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144

*Attorneys for Plaintiffs, Century-National  
Insurance Company, Pacific Pioneer  
Insurance Group, Inc., Pacific Pioneer  
Insurance Company, and UCA General  
Insurance Services*

*Attorneys for Defendant,  
Doug Gardner*

**ORDER**

IT IS SO ORDERED.

DATED this 28th day of November, 2018.

  
UNITED STATES MAGISTRATE JUDGE